

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

JUN 27 2014

JAMES N. HAYDEN, Clerk
By: *Allen*
Deputy Clerk

CHRISTOPHER TAURMAN

(Print your full name)

Plaintiff *pro se*,

v.

CIVIL ACTION FILE NO.

AT

1:14-CV-2029

(to be assigned by Clerk)

ING INVESTMENT MANAGEMENT

(UOWA US)

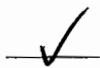
(Print full name of each defendant; an
employer is usually the defendant)

Defendant(s).

PRO SE EMPLOYMENT DISCRIMINATION COMPLAINT FORM

Claims and Jurisdiction

1. This employment discrimination lawsuit is brought under (check only those that apply):



Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., for employment discrimination on the basis of race, color, religion, sex, or national origin, or retaliation for exercising rights under this statute.

NOTE: To sue under Title VII, you generally must have received a notice of right-to-sue letter from the Equal Employment Opportunity Commission ("EEOC").

_____ Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621 et seq., for employment discrimination against persons age 40 and over, or retaliation for exercising rights under this statute.

NOTE: To sue under the Age Discrimination in Employment Act, you generally must first file a charge of discrimination with the EEOC.

_____ Americans With Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq., for employment discrimination on the basis of disability, or retaliation for exercising rights under this statute.

NOTE: To sue under the Americans With Disabilities Act, you generally must have received a notice of right-to-sue letter from the EEOC.

_____ Other (describe) _____

2. This Court has subject matter jurisdiction over this case under the above-listed statutes and under 28 U.S.C. §§ 1331 and 1343.

Parties

3. Plaintiff. Print your full name and mailing address below:

Name CHRISTOPHER THURMAN
Address 415 ARMOUR DR NE ATL 303
Atlanta, GA 30324

4. Defendant(s). Print below the name and address of each defendant listed on page 1 of this form:

Name ING INVESTMENT MANAGEMENT
Address BOA (BOFA US)

Name _____
Address _____

Name _____
Address _____

Location and Time

5. If the alleged discriminatory conduct occurred at a location different from the address provided for defendant(s), state where that discrimination occurred:

6. When did the alleged discrimination occur? (State date or time period)

Alleged discrimination began around
November 2011.

Administrative Procedures

7. Did you file a charge of discrimination against defendant(s) with the EEOC or any other federal agency? ☒ Yes ☐ No

If you checked "Yes," attach a copy of the charge to this complaint.

8. Have you received a Notice of Right-to-Sue letter from the EEOC?

☒ Yes ☐ No

If you checked "Yes," attach a copy of that letter to this complaint and state the date on which you received that letter:

April 4, 2014

9. If you are suing for **age discrimination**, check one of the following:

☐ 60 days or more have elapsed since I filed my charge of age discrimination with the EEOC

☐ Less than 60 days have passed since I filed my charge of age discrimination with the EEOC

10. If you were employed by an agency of the State of Georgia or unsuccessfully sought employment with a State agency, did you file a complaint against defendant(s) with the Georgia Commission on Equal Opportunity?

_____ Yes

_____ No

☒ Not applicable, because I was not an employee of, or applicant with, a State agency.

If you checked "Yes," attach a copy of the complaint you filed with the Georgia Commission on Equal Opportunity and describe below what happened with it (i.e., the complaint was dismissed, there was a hearing before a special master, or there was an appeal to Superior Court):

11. If you were employed by a Federal agency or unsuccessfully sought employment with a Federal agency, did you complete the administrative process established by that agency for persons alleging denial of equal employment opportunity?

_____ Yes

_____ No

☒ Not applicable, because I was not an employee of, or applicant with, a Federal agency.

If you checked "Yes," describe below what happened in that administrative process:

Nature of the Case

12. The conduct complained about in this lawsuit involves (check only those that apply):

☐ failure to hire me
☐ failure to promote me
☐ demotion
☒ reduction in my wages
☒ working under terms and conditions of employment that differed from similarly situated employees
☒ harassment
☒ retaliation
☐ termination of my employment
☐ failure to accommodate my disability
☐ other (please specify) _____

13. I believe that I was discriminated against because of (check only those that apply):

☐ my race or color, which is _____
☐ my religion, which is _____
☒ my sex (gender), which is ☒ male ☐ female
☐ my national origin, which is _____
☐ my age (my date of birth is _____)
☐ my disability or perceived disability, which is: _____

☐ my opposition to a practice of my employer that I believe violated the federal anti-discrimination laws or my participation in an EEOC investigation

☐ other (please specify) _____

14. Write below, as clearly as possible, the essential facts of your claim(s). Describe specifically the conduct that you believe was discriminatory or retaliatory and how each defendant was involved. Include any facts which show that the actions you are complaining about were discriminatory or retaliatory. Take time to organize your statements; you may use numbered paragraphs if you find that helpful. Do not make legal arguments or cite cases or statutes.

Around November of 2011, I began to notice that my manager at that time showed extreme favoritism to female employees, while I often was treated very differently. I addressed the manager about it, only to have the treatment get worse. Once I complained to her boss, the UP of the department, retaliation from both parties began. I was first paid less than a female employee w/ less experience and then after complaining, false negative reviews & a forced re-assignment of job duties occurred. Once I filed EEO charges, blatant and extreme harassment & retaliation began, and continued throughout my employment. Once the harassment & retaliation became too much to bear, I had a severe nose bleed, which caused me to have to go to the urgent care, in which the doctor ordered me to take a few days off. The UP, along with HR falsely claimed that I applied for short-term disability, & demanded that I not return to work, and locked me out of all systems, as well as the building, while the UP assessed personnel info.

(Attach no more than five additional sheets if necessary; type or write legibly only on one side of a page.)

15. Plaintiff still works for defendant(s)
 ✓ no longer works for defendant(s) or was not hired
16. If this is a disability-related claim, did defendant(s) deny a request for reasonable accommodation? Yes No

If you checked "Yes," please explain: _____

17. If your case goes to trial, it will be heard by a judge unless you elect a jury trial. Do you request a jury trial? _____ Yes ✓ No

Request for Relief

As relief from the allegations of discrimination and/or retaliation stated above, plaintiff prays that the Court grant the following relief (check any that apply):

- ✓ Defendant(s) be directed to dispose of negative performance reviews p.information in personnel file
- ✓ Money damages (list amounts) \$60,000
- ✓ Costs and fees involved in litigating this case
- ✓ Such other relief as may be appropriate

PLEASE READ BEFORE SIGNING THIS COMPLAINT

Before you sign this Complaint and file it with the Clerk, please review Rule 11 of the Federal Rules of Civil Procedure for a full description of your obligation of good faith in filing this Complaint and any motion or pleading in this Court, as well as the sanctions that may be imposed by the Court when a litigant (whether plaintiff or defendant) violates the provisions of Rule 11. These sanctions may include an order directing you to pay part or all of the reasonable attorney's fees and other expenses incurred by the defendant(s). Finally, if the defendant(s) is the prevailing party in this lawsuit, costs (other than attorney's fees) may be imposed upon you under Federal Rule of Civil Procedure 54(d)(1).

Signed, this 27 day of JUNE, 20 14


(Signature of plaintiff *pro se*)

Christopher Thurman
(Printed name of plaintiff *pro se*)

415 ARNOLD DR NE #6303
(street address)

Atlanta, GA 30304
(City, State, and zip code)

Ch4thurman@yahoo.com
(email address)

(403) 302-1236
(telephone number)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Christopher Thurman**
415 Armour Drive, #6303
Atlanta, GA 30324

From: **Atlanta District Office**
100 Alabama Street, S.W.
Suite 4R30
Atlanta, GA 30303



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

410-2012-06354

Richard S. Strouse,
Investigator

(404) 562-6832**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Bernice Williams-Kimbrough,
District Director

APR 01 2014

Enclosures(s)

(Date Mailed)

cc:

Yoon Kim
Counsel
ING
5780 Powers Ferry Road
Atlanta, GA 30327

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Christopher Thurman
415 Armour Drive, #6303
Atlanta, GA 30324

From: Atlanta District Office
100 Alabama Street, S.W.
Suite 4R30
Atlanta, GA 30303



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

410-2013-06419

Richard S. Strouse,
Investigator

(404) 562-6832

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



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On behalf of the Commission

APR 01 2014

Enclosures(s)

Bernice Williams-Kimbrough,
District Director

(Date Mailed)

cc:

Yoon Kim
Counsel
ING
5780 Powers Ferry Rd NW
Atlanta, GA 30327

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Christopher Thurman**
415 Armour Drive, #6303
Atlanta, GA 30324

From: **Atlanta District Office**
100 Alabama Street, S.W.
Suite 4R30
Atlanta, GA 30303



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

410-2013-03645

Richard S. Strouse,
Investigator

(404) 562-6832

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

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On behalf of the Commission

APR 01 2014

Enclosures(s)

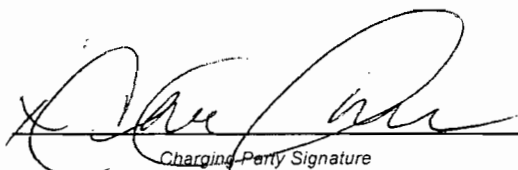
Bernice Williams-Kimbrough,
District Director

(Date Mailed)


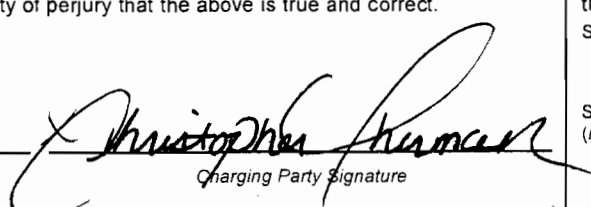
cc:

Yoon Kim
Counsel
ING
5780 Powers Ferry Road NW
Atlanta, GA 30327

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;"> 410-2012-06354 </div> </div>	
and EEOC			
<i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) Mr. Christopher Thurman		Home Phone (Incl. Area Code) (423) 362-1236	Date of Birth 11-05-1983
Street Address 415 Armour Drive, #6303, Atlanta, GA 30324		City, State and ZIP Code	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name ING INVESTMENT MANAGEMENT		No. Employees, Members 500 or More	Phone No. (Include Area Code) (770) 980-5695
Street Address 5780 Powers Ferry Road, Atlanta, GA 30327		City, State and ZIP Code	
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap; padding: 5px;"> <div style="margin-right: 10px;"><input type="checkbox"/> RACE</div> <div style="margin-right: 10px;"><input type="checkbox"/> COLOR</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> SEX</div> <div style="margin-right: 10px;"><input type="checkbox"/> RELIGION</div> <div style="margin-right: 10px;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> AGE</div> <div style="margin-right: 10px;"><input type="checkbox"/> DISABILITY</div> <div style="margin-right: 10px;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> OTHER (Specify) Equal Pay</div> </div>		DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between;"> <div> Earliest 03-15-2012 </div> <div> Latest 09-20-2012 </div> </div> <div style="text-align: right; margin-top: 10px;"> <input checked="" type="checkbox"/> CONTINUING ACTION </div>	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)). <p>I have been employed since September 2011, and my current position is Financial Analyst. On or about March '15, 2012, I was denied a bonus and a merit increase while a similarly situated female employee with less time at the company received both. On or about July 15, 2012, I learned that another similarly situated female was paid a higher salary than me. Following my complaint about my former female supervisor, I was reassigned to a more senior position with no salary increase while the female who switched positions with me was given a salary increase and more senior job title.</p> <p>I have not been given a satisfactory explanation for these actions.</p> <p>I believe that I have been discriminated against because of my sex (male), in violation of Title VII of the Civil Rights Act of 1964, as amended, and the Equal Pay Act of 1963, as amended, and in retaliation for complaining about unlawful discrimination, in violation of Title VII of the Civil Rights Act of 1964.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
<div style="display: flex; justify-content: space-between;"> <div> Sep 20, 2012 Date </div> <div>  Charging Party Signature </div> </div>		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

EEOC Form 5 (11/09)

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and EEOC			
State or local Agency, if any			
Name (indicate Mr., Ms., Mrs.): Mr. Christopher Thurman		Home Phone (Incl. Area Code) (423) 362-1236	Date of Birth 11-05-1983
Street Address City, State and ZIP Code 415 Armour Drive, #6303, Atlanta, GA 30324			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name ING INVESTMENT MANAGEMENT		No. Employees, Members 500 or More	Phone No. (Include Area Code) (770) 980-6580
Street Address City, State and ZIP Code 5780 Powers Ferry Road Nw, Atlanta, GA 30327			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap; padding: 5px;"> <div style="margin-right: 10px;"><input type="checkbox"/> RACE</div> <div style="margin-right: 10px;"><input type="checkbox"/> COLOR</div> <div style="margin-right: 10px;"><input type="checkbox"/> SEX</div> <div style="margin-right: 10px;"><input type="checkbox"/> RELIGION</div> <div style="margin-right: 10px;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> AGE</div> <div style="margin-right: 10px;"><input type="checkbox"/> DISABILITY</div> <div style="margin-right: 10px;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> OTHER (Specify)</div> </div>		DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between;"> <div> Earliest 02-15-2013 </div> <div> Latest 02-15-2013 </div> </div> <div style="margin-top: 10px;"> <input type="checkbox"/> CONTINUING ACTION </div>	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I have been employed as a Financial Analyst since September 2011. On September 20, 2012, I filed an EEOC charge primarily alleging sex discrimination by Melanie Mewborne, my manager at the time. On or about February 15, 2013, I received a negative annual review (and consequently a reduced annual bonus) that resulted from Melanie Mewborne's direct input in the review.</p> <p>I believe that I have been discriminated against in retaliation for complaining about unlawful discrimination, in violation of Title VII of the Civil Rights Act of 1964, as amended.</p> <div style="text-align: right; margin-top: 20px;">  </div>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;"> Apr 26, 2013 Date </div> <div style="text-align: center;">  Charging Party Signature </div> </div>		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

147562-6900
6910

Christopher Thurman

415 Armour Drive N.E., Apt 6303

Atlanta, GA 30324

Thurman
404-249-1525

Notice to File an Additional Discrimination Charge for charge/case # 410-2012-06354:

I am writing this letter to ask that you file an additional charge of harassment and retaliation to my already pending investigation due to the following acts:

In June of 2013, the head of Investment Accounting, Bill Whipple, learned that there were going to be layoffs on the Human resources staff, which included the then current head of human resources, as well as members of the dispute resolution team, which I had been working with regarding my internal issues with Bill and my previous manager, Melanie Mewborne. Upon telling a few staff members about this situation, all of a sudden I began to get e-mails from him regarding alleged performance issues, as well as I was given a work schedule with set hours, which was unprecedented in that department, and unique in the fact that I was the only person to have such a schedule. I exchanged several e-mails with Bill asking why this was taking place, and the only explanation he could give me was that he had performance concerns, which had not been expressed previously.

On Wednesday 7-10-2013, around 2:00 p.m., I experienced a severe nose bleed while at work, in which I had to immediately leave and visit an urgent care center. After my doctor visit, I called my Human resources dispute resolution contact and notified her of the situation, and the fact that I had been advised by the physician to take a couple of days off. The HR person described the short term disability (STD) process to me in case I needed to take off longer, and advised me to notify my supervisor. On Thursday morning 7-11-2013, I e-mailed my supervisor to notify her that I was taking Thursday 7-11-2013, and Friday 7-12-2013 off to rest per doctor's advice, and would be returning on Monday 7-15-2013. I immediately received an e-mail back from her stating that she had been informed that I was intending to apply for STD and that my network access and building access had been revoked. Confused and uninformed, I e-mailed her back immediately and notified her that I was **not** and **had not applied** for STD, and that information was incorrect, and to please advise on where she received such erroneous information from. I never heard back from her. I immediately called the HR contact and notified her of what was going on, and she insisted that I told her I would be applying for (STD), thus an argument began.

RECEIVED

SEP 05 2013

EEOC-ATDO

On Friday 7-12-2013, I get an e-mail from the HR contact letting me know that an investigation was being done against me, and not to return to the office until further notice. I later learned that this was due to the fact that Bill Whipple used this opportunity to ask the IT department to give him access to my desktop, so that he could look through all of my business and personal files to find something to get me fired from the company, as a means to retaliating against me for filing prior EEOC charges, as well as internal grievances with the company's HR department. Bill Whipple then took documents to the legal department which they then gave over to special investigations to investigate. As a result of all this, I decided to resign, as the stress and harassment was taking a toll on my mental, physical, emotional, and spiritual well-being, which is why I encountered the nose bleed on 7-10-2013, after getting upset when Bill Whipple called a meeting with members of different departments within the

company to tell them that I was the reason for a huge report not being finished on time. I was not invited to the meeting, but I later found out from another employee, and was so upset that the bleeding began.

It is clear that Bill set up a plan to retaliate against me. I had no intentions on filing for short term-disability; however, even if I had, my network and building access was not supposed to be revoked until I actually applied for it. Per company policy, once an employee **APPLIES** for STD (not is thinking about applying,) five PTO days must be taken until a decision is made. The day after my incident happened, Bill Whipple immediately began the retaliation process of obtaining access to my computer and desktop, searched through all files and e-mails, and took information to the legal department **all in one day**. Again, I **NEVER** applied for STD and should not have been lied on. This act, along with the continuation of harassing e-mails and singling out, were gross acts of harassment and retaliation, and I ask that you please file a formal charge reflecting such. Please let me know if you need any further information.

Company Receiving Charge:

HEADQUARTERS:

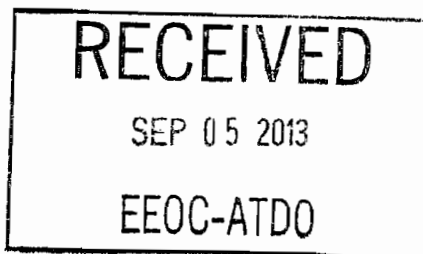
ING Investment Management

230 Park Avenue

New York, NY 10169

(212) 309-8200

Attn: Kevin Silva



Local Office:

5780 Powers Ferry Road

Atlanta, GA 30327

(770) 980-5711

Attn:

Kind Regards,

Christopher Thurman